



Cullen | Dykman

Cullen and Dykman LLP  
80 State Street, Suite 900  
Albany, New York 12207

CHRISTOPHER E. BUCKEY  
PARTNER  
DIRECT: (518) 788-9406  
CBUCKEY@CULLENLLP.COM

December 3, 2024

**VIA ECF-PACER**

Magistrate Judge Miroslav Lovric  
United States District Court  
Northern District of New York  
Federal Building and U.S. Courthouse  
15 Henry Street  
Binghamton, New York 13901

Re: *Adirondack Trust Company v. Maha Laxmi Corp., et. al.*  
1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Judge Lovric:

This firm represents Plaintiff Adirondack Trust Company (“ATC”) in the above-referenced matter. In accordance with the Court’s November 4, 2024 text order (Dkt. 118), we write to provide a status update to the Court.

The parties have completed fact discovery in accordance with the scheduling order. (Dkt. 97). ATC served its supplemental expert report on October 31, 2024. Defendants’ expert report is due on December 6, 2024.

As we previously informed the Court, ATC received a letter from Rahul Jain, who claimed to be the individual making edits on ATC’s Wikipedia page under the account name Nobbled thoroughbred. (Dkt. 117). On November 6, 2024, Niral Patel provided an affidavit denying his involvement with the Wikipedia edits made by the Nobbled thoroughbred account. A copy of this affidavit is attached to this letter as **Exhibit A**. In the affidavit, Mr. Patel does not deny making any edits on the ATC Wikipedia account; rather, he states that he did not make edits through the Nobbled thoroughbred account.<sup>1</sup> Similarly, Mr. Patel does not deny any affiliation with Rahul Jain and only states that he did not ask anyone to edit ATC’s Wikipedia page.<sup>2</sup>

---

<sup>1</sup> Ex. A.

<sup>2</sup> Ex. A.

---

FOUNDED 1850

NEW YORK NEW JERSEY WASHINGTON DC

December 3, 2024  
Page No.: 2

Since we raised this issue with the Court there have been no subsequent edits of ATC's Wikipedia page by this account and the Nobbled thoroughbred "has been abandoned" by the user.<sup>3</sup> Accordingly, ATC is no longer seeking discovery regarding the Wikipedia account. ATC expressly reserves its rights to request permission from the Court to seek discovery on this matter should the conduct resume.

Please contact me if the Court has any questions.

Respectfully,

A handwritten signature in black ink, appearing to be "CB" or "CE" with a stylized flourish.

Christopher E. Buckey

cc: All Counsel of Record (via ECF-PACER)

---

<sup>3</sup> See Wikipedia, User: Nobbled thoroughbred (last visited December 3, 2024).